

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

NOTICE OF AGENDA FOR HEARING ON APRIL 22, 2025 at 10:30 A.M. (ET)²

**This proceeding will be conducted in-person.
Delaware counsel is expected to appear in person and all other parties
are permitted to appear remotely via Zoom.**

**Please refer to Judge Shannon's Chambers Procedures
(<https://www.deb.uscourts.gov/judge-brendan-l-shannon>) and the
Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>)
for information on who may participate remotely, the method of allowed
participation (video or audio), Judge Shannon's expectations of
remote participants, and the advance registration requirements.**

**Registration is required by 4:00 p.m. (ET) the business day
before the hearing unless otherwise noticed using the
eCourtAppearances tool available on the Court's website.**

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors' headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

² All motions and other pleadings referenced herein are available online at the following address: <https://cases.stretto.com/momca>.

RESOLVED MATTERS:

1. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Trade Claimants and 503(b)(9) Claims; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief [Docket No. 138 – filed on March 27, 2025]

Response/Objection Deadline: April 15, 2025 at 4:00 p.m. (ET)

Responses Received:

- a. Informal comments from the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”)

Related Documents:

- i. Notice of Hearing Regarding (A) Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Trade Claimants and 503(b)(9) Claims; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief and (B) Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [Docket No. 153 – filed on March 28, 2025]
- ii. Revised Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Trade Claimants and 503(b)(9) Claims; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief [Docket No. 169 – entered on April 1, 2025]
- iii. Notice of Entry of Interim Order and Hearing Regarding Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Trade Claimants and 503(b)(9) Claims; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief [Docket No. 173 – filed on April 1, 2025]
- iv. Certification of Counsel Regarding Revised Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Trade Claimants and 503(b)(9) Claims; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief [Docket No. 224 – filed on April 16, 2025]

- v. Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Trade Claimants and 503(b)(9) Claims; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief [Docket No. 230 – entered on April 17, 2025]

Status: The final order has been entered. No hearing is necessary.

- 2. Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [Docket No. 139 – filed on March 27, 2025]

Response/Objection Deadline: April 15, 2025 at 4:00 p.m. (ET)

Responses Received:

- a. Informal comments from the U.S. Trustee

Related Documents:

- i. Notice of Hearing Regarding (A) Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Trade Claimants and 503(b)(9) Claims; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereto; and (III) Granting Related Relief and (B) Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [Docket No. 153 – filed on March 28, 2025]
- ii. Revised Interim Order (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [Docket No. 170 – entered on April 1, 2025]
- iii. Notice of Entry of Interim Order and Hearing Regarding Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [Docket No. 174 – filed on April 1, 2025]

- iv. Certification of Counsel Regarding Revised Final Order (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [Docket No. 225 – filed on April 16, 2025]
- v. Final Order (I) Authorizing the Debtors to (A) Maintain Existing Insurance Programs and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, or Enter Into New Insurance Programs; (II) Authorizing all Banks to Honor Payments of Insurance Obligations; and (III) Granting Related Relief [Docket No. 231 – entered on April 17, 2025]

Status: The final order has been entered. No hearing is necessary.

MATTERS GOING FORWARD:

- 3. Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 89](#) – filed on March 19, 2025]

Response/Objection Deadline: April 15, 2025 at 4:00 p.m. (ET); extended until April 17, 2025 at 4:00 p.m. (ET) for the Honarkar Parties, The Picerne Group, Preferred Bank, Banc of California, Lone Oak Mortgage Fund, LLC, Wilshire Quinn Income Fund, LLC, Enterprise Bank & Trust, and the U.S. Trustee

Responses Received:

- a. Informal comments from the U.S. Trustee
- b. Objection of Mohammad Honarkar and 4G Wireless, Inc. to Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 96](#) – filed on March 21, 2025]
- c. Reservation of Rights of The Picerne Group, Inc. in Connection With the Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 103](#) – filed on March 23, 2025]
- d. Limited Objection of Banc of California to Debtors' Motion Authorizing Postpetition Financing [[Docket No. 104](#) – filed on March 23, 2025]

- e. Preferred Bank's Opposition to Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 108](#) – filed on March 24, 2025]
- f. Debtors' Reply in Support of DIP Motion [[Docket No. 147](#) – filed on March 28, 2025]
- g. Notice of Specialty DIP, LLC Disclosures [[Docket No. 148](#) – filed on March 28, 2025]
- h. Corrected Notice of Specialty DIP, LLC Disclosures [[Docket No. 158](#) – filed on March 30, 2025]
- i. Objection of Banc of California to Debtors' Motion Authorizing Postpetition Financing [[Docket No. 159](#) – filed on March 30, 2025]
- j. Preferred Bank's Limited Objection to Debtors' Motion for Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 234](#) – filed on April 17, 2025]
- k. Informal comments from Enterprise Bank

Related Documents:

- i. Re-Notice of Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 91](#) – filed on March 20, 2025]
- ii. Bridge Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing and (II) Granting Related Relief [[Docket No. 114](#) – entered on March 25, 2025]
- iii. Notice of Filing of 13 Week Cash Flow Budgets [[Docket No. 135](#) – filed on March 27, 2025]
- iv. Notice of Filing of Revised Interim DIP Order [[Docket No. 149](#) – filed on March 28, 2025]
- v. Supplemental Declaration of Mark Shinderman in Support of Motion of the Debtors for Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing; and (II) Granting Related Relief [[Docket No. 157](#) – filed on March 30, 2025]³

³ The Supplemental Declaration filed at Docket No. 142 contained a factual error and, therefore, was withdrawn at Docket No. 156 prior to filing the corrected version at Docket No. 157.

- vi. Order Granting Motion of the Debtors for Leave to File and Serve a Late Reply in Support of the Debtors' DIP Financing Motion [[Docket No. 162](#) – entered on March 31, 2025]
- vii. Interim Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (II) Granting Related Relief [[Docket No. 187](#) – entered on April 4, 2025]
- viii. Notice of Filing of Proposed Final DIP Order [[Docket No. 235](#) - filed on April 17, 2025]

Status: This matter is going forward.

- 4. Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [[Docket No. 175](#) – filed on April 2, 2025]

Response/Objection Deadline: April 15, 2025 at 4:00 p.m. (ET); extended until April 17, 2025 at 4:00 p.m. (ET) for the Debtors, the Investor Debtors,⁴ Deba Shyam, Andrew Stupin, and Bhajneet Singh Malik.

Responses Received:

- a. Limited Objection Nano Bancs Limited Objection and Reservation of Rights in Response to Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [[Docket No. 223](#) – filed on April 15, 2025]
- b. Objection of the MOM Members to the Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [[Docket No. 236](#) – filed on April 17, 2025]
- c. Objection of Bhajneet Singh Malik, Deba Shyam, and Andrew Stupin to Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Granting Relief From the Automatic Stay [[Docket No. 237](#) – filed on April 17, 2025]
- d. Debtors' Objection to Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) [[Docket No. 238](#) - filed on April 17, 2025]
- e. Declaration of Mark Shinderman in Support of Debtors' Stay Relief Objection [[Docket No. 239](#) - filed on April 17, 2025]

⁴ "Investor Debtors" shall mean MOM CA Investor Group LLC, MOM BS Investor Group LLC, and MOM AS Investor Group LLC, whose chapter 11 cases are being jointly administered under Case No. 25-10510 (BLS).

Related Documents: None.

Status: This matter is going forward.

Dated: April 17, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Gregory J. Flasser

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